

BROWN & CONNERY, LLP

William F. Cook, Esquire

James P. Clancy, Esquire

360 Haddon Avenue

P.O. Box 539

Westmont, New Jersey 08108

(856) 854-8900

*Attorneys for Defendants Camden County Police Department,
County of Camden, and Officer Jesse Zachinelli*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
(CAMDEN VICINAGE)**

STEVEN CARMICHAEL,

Plaintiff,

v.

**CAMDEN COUNTY POLICE
DEPARTMENT, COUNTY OF
CAMDEN, CITY OF CAMDEN,
OFFICER JESSE ZACHINELLI,
JOHN/JANE DOE OFFICERS 1-10,
ABC CORPORATIONS 1-5, jointly,
severally and/or in the alternative,**

Defendants.

CIVIL ACTION NO. 1-22-cv-05019

**APPLICATION FOR AUTOMATIC
CLERK'S EXTENSION
PURSUANT TO L. CIV. R. 6.1(b)**

Application is hereby made for a Clerk's Order extending the time within which Defendants Camden County Police Department, County of Camden, and Officer Jesse Zachnielli ("Camden County Defendants") may answer, move, or otherwise respond to the Complaint. In support of this application, Camden County Defendants state:

1. The Camden County Defendants were served on September 14, 2022;
2. Pursuant to Fed. R. Civ. P. 12, the deadline for Camden County Defendants to answer, move, or file some other responsive pleading is October 5, 2022, and that time period has not yet expired;
3. No previous extension has been obtained;

4. This application is made without any prejudice to the right of Camden County Defendants to assert any and all applicable defenses and arguments and nothing herein shall be deemed to constitute a waiver;
5. Pursuant to this application, the new deadline for Camden County Defendants to answer, move or file some other responsive pleading will be October 19, 2022.

Respectfully submitted,

BROWN & CONNERY, LLP

Date: September 27, 2022

/s/ William F. Cook

William F. Cook, Esquire

wcook@brownconnery.com

360 Haddon Avenue

Westmont, NJ 08108

(856) 854-8900

Attorneys for Camden County Defendants

ORDER

The above application is ORDERED Granted and Camden County Defendants' deadline to Answer, Move or Otherwise Respond to Plaintiff's Complaint is extended to October 19, 2022.

Clerk of the Court

CERTIFICATE OF SERVICE

I certify that the within Application for Automatic Clerk's Extension was served by filing this document with the CM/ECF system, which electronically served same on:

Clerk, United States District Court
United States District Court for the District of New Jersey (Camden Vicinage)
Mitchell H. Cohen Building & U.S. Courthouse
1 John F. Gerry Plaza
Camden, New Jersey 08101
(via ECF)

Joseph D. Lento, Esquire
Lento Law Group, P.C.
3000 Atrium Way, Suite 200
Mount Laurel, New Jersey 08054
Tel: (856) 652-2000
Email: jdmento@lentolawgroup.com
Attorney for Plaintiff
(via ECF)

By: /s/ William F. Cook
William F. Cook

Dated: September 27, 2022